

NY

U.S District Courts

Case number: ~~18~~
1:18-cv-03117

Plaintiff
Erica Speed
VS

Judge Kendall
^{trial}
Jury Demand

Defendant
Teva pharmaceutical
Teva KOKU pharm USA

FILED

AUG 16 2018

THOMAS G BRUTON
CLERK, U.S DISTRICT COURT

2018 AUG 16 PM 4:20

Amended Complaint

Plaintiff Erica Speed,
prose for her amended Complaint
states as follows.

Erica Speed

8/16/2018

Dhruv

Introduction Jurisdiction

- ①
- ② This Court has Jurisdiction 28 U.S.C. 31332. Plaintiff is a citizen of Illinois. Teikoku Pharm USA and Teva pharmaceutical industries LTD. are not incorporated in Illinois. Nor does either of them have principal place of business in Illinois.
- ③ The matter in controversy exceeds the sum of value of \$ 75,000, exclusive of interest and costs.
- ④ Venue is proper in this jurisdiction district under 28 U.S.C. 31391 in which a substantial part of the events or omissions giving rise to the claims accrued.

- ⑤ Plaintiff was married to MacArthur Davis. Davis was 49 yrs. ~~old~~ of age, Davis died in Chicago Illinois.
- ⑥ Teikoku Pharm USA ("Tp") manufactured a pharmaceutical given by Sinai Hospital to Davis, manufacturer located in Cincinnati with Teva pharmaceutical industries.
- ⑦ Teva pharmaceutical industries Ltd is in combination with Tp, manufactured the
- ⑧ Plaintiff suffered damages including loss of ~~relationship~~ consciousness, emotional distress and sufficient
Claim - Count I
- ⑨ Plaintiff restates paragraph 1-8 above.
- ⑩ Tp or Tp I owed a duty to Davis and the public to distribute safe drugs.
- ⑪ Tp or Tp I breached their aforesaid duties by allowing into commerce an unsafe drug administered to Davis, Lidocaine.

(12) As a direct and proximate cause of the aforesaid breaches of duties Davis died has caused plaintiff the aforesaid damages.

(13) Plaintiff suffered damages including the loss of companionship, loss of consortium, emotional distress and financial support.

(14) TP is liable to plaintiff in the aforesaid damages. TP caused damages by manufacturing and distributing an unsafe drug lidocaine.

Claim - Count II

(15) Plaintiff alleges persons 1-14 above and count I.

(16) TPL is liable to plaintiff for the前述 damages.

(17) TRI caused the damages by manufacturing and distributing an unsafe drug lidocaine.

(18)

Husband / man's name Davis became fatally injured due to negligence in addition to Severe emotional trauma caused by sudden death of my husband there are other factors that weigh heavily on the shoulders of our dependents if an injustice has occurred by Roche, grief may be prolonged and other expenses.

The Tays and Teikopharm product ^(and) ~~etc~~ distributed and damaged with side effects of fatal risk specified onto labels.

Statement claim (Amended)

Sign: Eric Speer

08-16-2018

US District Courts
Answered

No Case filed under any
Courts no ongoing law suit cases
filed by Plaintiff.

Erica Speed
8/16/2018

Erica Speed

~~Plaintiff~~
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Judgment in plaintiff's favor and
against the defendants jointly and
severally for compensatory damages, punitive
damages, and plaintiff's costs of
this action, and such other
and further relief the Court considers
proper.

Date 8/16/18

Pl ES , re se

Court Special

addressee

Phone #

JURY TRIAL
DEMANDED